



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

August 1, 2018

Ms. Kelly Dixon, Director
Land Protection Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: Request for Review and Support of the Source Control Record of Decision for the Wilcox Oil Company Superfund Site

Dear Ms. Dixon:

The U.S. Environmental Protection Agency (EPA) requests your review and support of the proposed remedy identified in the Source Control Record of Decision (ROD) for the Wilcox Oil Company Superfund Site, Bristow, Oklahoma.

The rationale for the proposed remedy is explained in the draft Source Control ROD for the Wilcox Oil Company Superfund Site, which has been provided electronically to Oklahoma Department of Environmental Quality staff. The EPA Remedial Project Manager, Ms. Katrina Higgins-Coltrain, has corresponded with her State counterpart, Mr. Todd Downham, by phone and via e-mail to provide appropriate materials and to obtain input related to identifying an acceptable source control remedial response action.

This action is limited in scope to addressing tank and lead additive area source material through excavation, treatment, and offsite disposal. By taking this source control action, significant human health and ecological risk reduction will be accomplished through the removal of primary sources located throughout the site at or near the soil surface, specifically residential properties. In addition, further migration and environmental degradation of adjacent waterways (e.g., Sand Creek and the East Tributary), wetlands, and stream riparian areas is mitigated. Because this action does not constitute the final remedy for the site, subsequent actions to address fully the threats posed by conditions at this site will be documented in a future final site decision document.

The proposed remedy includes excavation, treatment, and offsite disposal of approximately 30,362 y³ at an estimated cost of \$4,135, 294. Approximately 28,093 y³ of tank waste source material will be excavated and disposed of offsite while approximately 2269 y³ of lead additive area material will be treated and disposed of offsite. Excavated areas will be backfilled with clean soil from an offsite location and re-vegetated. All excavated areas will be graded for drainage and appropriate erosion controls implemented.

Currently, the Wilcox Oil Company Superfund Site is in the remedial investigation and feasibility study phase of the Superfund Process. Although final site investigation and risk assessments have not been completed, taking appropriate source control actions at sites during the investigation stage of the process

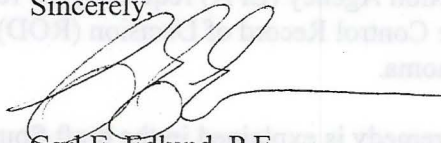


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is consistent with the National Contingency Plan (NCP) and existing EPA guidance. The NCP [40 CFR § 300.430(a)(1)] states, "Remedial actions are to be implemented as soon as site data and information make it possible to do so." Site investigation will be ongoing concurrent with the implementation of this remedial response.

We appreciate the Oklahoma Department of Environmental Quality's cooperation and coordination in addressing the cleanup issues associated with this site. As always, EPA appreciates the dedication of your staff in assisting us to achieve our overall goal of protecting human health and the environment. Should you have additional questions or concerns regarding the site, please contact the Remedial Project Manager, Ms. Katrina Higgins-Coltrain by electronic mail at coltrain.katrina@epa.gov or by phone at (214) 665-8143. Please contact the site attorney, Mr. Marvin Benton by electronic mail at benton.marvin@epa.gov or by phone at (214) 665-3190 with any legal questions.

Sincerely,



Carl E. Edlund, P.E.

Director

Superfund Division

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Sincerely,

Carl E. Edlund, P.E.
Director
Superfund Division

6SF-RL:COLTRAIN – Request ODEQ support for Source Control ROD draft (087-20-18).docx

COLTRAIN
6SF-RL

ATKINS
6SF-RL

MEYER
6SF-R

BENTON
6RC-S

PEYCKE
6RC-S

ROUTING AND APPROVAL FORM

Date

07/20/18

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Katrina Coltrain (6SF-RL)

KATC

7/23/18

2. Blake Atkins (6SF-RL)

BA

7/23

3. John Meyer (6SF-R)

JM

7/31

4. Dyann Twine/log in for 6RC-S

D

7/31/18

5. Marvin Benton (6RC-S)

MB

8/1/18

6. Mark Peycke (6RC-S)

MARK

08/01

7. Dyann Twine/log out for 6RC-S

Peycke

8-1-18

8. Stephanie Delgado (6SF-R)

SD

8-1-18

9. 6SF log in

JD

8/1/18

10. Carl Edlund (6SF)

1767

CE

8/1/18

<input type="checkbox"/> Action	<input type="checkbox"/> File	<input type="checkbox"/> Note and Return
<input checked="" type="checkbox"/> Approval	<input checked="" type="checkbox"/> For Clearance	<input type="checkbox"/> Per Conversation
<input type="checkbox"/> As Requested	<input type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input checked="" type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input checked="" type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	

REMARKS

11. 6SF log out

JD 8/1/18

12. Stephanie Delgado (6SF-R)

→ please call me when ready - Katrina 8143 - thanks

SD 8/2/18

See my email
w/pdf. I
mailed to
Kelly.Letter to Kelly Dixon - Request ODEQ support of Source Control Record of Decision
for the Wilcox Oil Company Superfund Site

FROM: (Name, org. symbol, Agency/Post)

Katrina Coltrain (6SF-RL)

Room No. - Bldg.
10.021Phone No.
(214) 665-8143

ORD OF - 41

(Rev. 5-14) (WebForms v3.7)

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